

FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

JUL 09 2001

OFFICE OF
MANAGING DIRECTOR

Richard Estevez, Esq.
Fletcher, Heald & Hildreth, P.L.C.
11th Floor
1300 North 17th Street
Arlington, VA 22209-3801

Re: Petition for Reduction of
Regulatory Fees for FY 1998
Fee Control No. 9809158835519002

Dear Mr. Estevez:

This letter is in response to your request for reduction of the regulatory fees for Fiscal Year 1998 and waiver of the associated penalty of \$3,250.00 for insufficient payment, submitted on behalf of Pappas Concord Partners, licensee of stations KTNC(TV), Concord, California and KFWU(TV), Fort Bragg, California.

It appears that \$1,175.00 was submitted as the regulatory fee for KTNC(TV) for FY 1998, but that on March 3, 1999 Pappas was informed that the correct fee for KTNC(TV) should be \$14,175.00, leaving a balance due of \$13,000.00, that a penalty of \$3,250.00 was warranted and that Pappas owes the Commission a total of \$16,250.00. You state, inter alia, that KTNC(TV) rebroadcasts, as a satellite, the programming broadcast by KFWU(TV), and that \$1,175.00, the amount paid, is the correct regulatory fee for a TV station operating as a satellite. Although you also argue, alternatively, that the FY 1998 regulatory fee for KFWU(TV) should be reduced, that is a question that is unrelated to the fees due for KTNC(TV) and that, if warranted, should be raised in an independent waiver request.

In connection with your claim that KTNC(TV) operates as a satellite, you note that the 1998 Edition of *Television & Cable Factbook* does not recognize KTNC(TV)'s operation as a satellite and you acknowledge that the 1999 Edition of *Television & Cable Factbook* lists KTNC(TV) as the parent in a satellite relationship. Indeed the 2000 Edition of *Television & Cable Factbook* reflects the same information. Under these circumstances, and in the absence of any other documentation establishing that KTNC(TV) is in fact operating solely as a satellite of another station, you have failed to demonstrate that your request for reduction of the FY 1998 regulatory fees by an amount of \$13,000.00, or for waiver of the associated penalty in the amount of \$3,250.00, is warranted. Therefore, your request is dismissed. **Payment of the 1998 regulatory fee and penalty in the total amount of \$16,250.00 is now due.** This payment should be submitted together with a Form 159 (copy enclosed) within 30 days from the date of this letter. In view of your

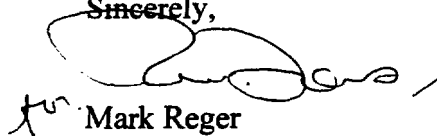
Richard Estevez, Esq.

2

allegations, however, your request may be refiled together with appropriate supporting documentation within 30 days from the date of this letter.

If you have any questions concerning this letter, please contact the Revenue and Receivable Operation Group at (202) 418-1995.

Sincerely,



for Mark Reger
Chief Financial Officer

SAM BAVENDY
ANNE GOODWIN CRUMP
VINCENT J. CURTIS, JR.
RICHARD J. ESTEVEZ
PAUL J. FELDMAN
RICHARD HILDRETH
FRANK R. JAZZO
ANDREW S. KERSTING
EUGENE M. LAWSON, JR.
SUSAN A. MARSHALL
HARRY C. MARTIN
GEORGE PETRUTSAS
RAYMOND J. QUIANZON
LEONARD R. RAISH
JAMES P. RILEY
KATHLEEN VICTORY
HOWARD M. WEISS
* NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETH, P.L.C.

ATTORNEYS AT LAW

11th FLOOR, 1300 NORTH 17th STREET
ARLINGTON, VIRGINIA 22209-3801

(703) 812-0400

TELECOPIER

(703) 812-0486

INTERNET

www.fhh-telcomlaw.com

FRANK U. FLETCHER
(1938-1985)
ROBERT L. HEALD
(1956-1983)
PAUL D. P. SPEARMAN
(1936-1982)
FRANK ROBERSON
(1936-1981)
RUSSELL ROWELL
(1948-1977)

EDWARD F. KENEHAN
(1980-1978)

CONSULTANT FOR INTERNATIONAL AND
INTERGOVERNMENTAL AFFAIRS
SHELDON J. KRYSS
U.S. AMBASSADOR (R)

OF COUNSEL
EDWARD A. CAINE
MITCHELL LAZARUS
EDWARD S. O'NEILL
JOHN JOSEPH SMITH

WRITER'S DIRECT

May 26, 1999

(703) 812-0511

BY HAND DELIVERY

Magalie Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20544
Attention: Managing Director

RECEIVED
MAY 26 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Request for Deferral and Reduction of 1998 Regulatory Fees
for Television Stations KTNC(TV), Concord, California / KFWU(TV),
Fort Bragg, California

Dear Ms. Salas:

On behalf of Pappas Concord Partners¹ ("Pappas"), licensee of KTNC(TV), Concord, California and KFWU(TV), Fort Bragg, California, this letter respectfully requests reduction of its 1998 regulatory fees for stations KTNC and/or KFWU. As demonstrated in detail below, good cause exists and the public interest would be served by this reduction. For reasons also stated below, Pappas respectfully requests deferral of any payment obligation pending consideration of its reduction showing.

Background

This request is being filed as a result of a letter from the FCC's Office of Managing Director dated March 3, 1999,² concerning FY 1998 regulatory fees for KTNC, Concord,

¹ Pappas Telecasting of Concord, A California Limited Partnership, was the prior licensee of both KTNC and KFWU. The licenses were subsequently transferred on a *pro forma* basis to Pappas Concord Partners, pursuant to FCC authorization.

² A copy of the letter is attached for ease of reference.

Magalie Salas, Esq.

May 26, 1999

Page 2

California. The FCC's letter asserts that an erroneous regulatory fee was paid for KTNC, and requests the payment of an additional \$13,000, plus a \$3,250 insufficient fee penalty, for its FY1998 regulatory fees or, in the alternative, the submission of a statement establishing that Pappas is not obligated to pay the additional amount.

On April 14, 1999, Pappas filed a statement detailing why it was not obligated to pay the additional amount. Further, Pappas demonstrated that the payment of such additional amount would be contrary to the public interest and the Commission's rules and regulations concerning the assessment and collection of regulatory fees. Subsequent to Pappas' response, Pappas was informed in a teleconference with Claudette Pride, Chief of the FCC's Fee Section, that a formal request for reduction and deferral with the Managing Director would be necessary. Accordingly, pursuant to Section 1.1166 of the FCC's rules, Pappas hereby respectfully submits the following request.³

Request for Reduction/Deferral

Section 1.1166 states that regulatory fees may be reduced in specific instances, on a case by case basis, where good cause is shown and where a reduction would promote the public interest. See 47 CFR §1.1166. As stated above, Pappas is the licensee of both UHF TV station KTNC, Concord, California, and VHF TV station KFWU, Fort Bragg, California (collectively referred to as the "Stations"). Both KTNC and KFWU are listed in the 5th ranked San Francisco-Oakland-San Jose Designated Market Area (DMA) by TV & Cable Factbook No. 66 (1998). Since April 1997, the Stations have had a parent/satellite relationship whereby the stations air the same programming. KTNC rebroadcasts, as a satellite, the programming broadcast by KFWU. KTNC makes no local origination.

While the stations are in the same DMA, such a parent/satellite arrangement is in the public interest since each station serves a different part of the San Francisco DMA. In particular, KFWU is located in the northern portion of the DMA and serves approximately 29,120 television households, whereas KTNC is located toward the center of the DMA and serves approximately 368,530 television households. See TV & Cable Factbook No. 66 (1998), A-112, A-171. The parent/satellite relationship allows the Stations to maximize programming to the DMA allowing for the provision of quality programming to both station's service areas. The Commission has long recognized the public interest benefits of the parent/satellite relationship. See *Television Satellite Stations Review of Policy and Rules (Television Satellite Stations)*, 6 FCC Rcd 4212.

³ If Pappas would have known that questions would arise concerning the parent/satellite relationship, Pappas would have filed this request with its regulatory fee payment at the time such payments were due.

Magalie Salas, Esq.

May 26, 1999

Page 3

As stated above, the Stations operated as parent/satellite during the FY1998 regulatory fee period.⁴ Since KFWU sends the Stations' programming to KTNC for broadcast, KFWU is the parent and KTNC is the satellite.⁵ Pappas filed its regulatory fees accordingly, remitting \$1,175 in payment of KTNC's regulatory fees (Satellite TV Station Fee) and \$37,575 for KFWU (Commercial VHF Station in Markets 1-10). See *In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 1998*, MM Docket No. 98-36, released June 16, 1998.

Pappas is now cognizant that the KFWU/KTNC parent/satellite relationship is not listed in the 1998 Edition of Warren Publishing's Television & Cable Factbook ("1998 Factbook").⁶ Yet, despite not being listed in the 1998 Factbook, the Stations in fact operated as parent/satellite and thus, a reduction of fees is warranted. As demonstrated below, such a reduction in this instance is consistent with the Commission's underlying policies of the assessment and collection of regulatory fees.

In the Commission's *Memorandum Opinion and Order* concerning the assessment and collection of regulatory fees for the fiscal year 1994, the Commission analyzed parent/satellite relationships and the assessment of regulatory fees for such combinations. The Commission recognized the public interest factors involved with such relationships and the possible inequities of assessing full service fees to both stations. See *Assessment and Collection of Regulatory Fees for the 1994 Fiscal Year*, MD Docket No. 94-19, at paras. 18-22 (June 22, 1995). The Commission stated that it would analyze parent/satellite relationships based on the total of households served and assess regulatory fees on a case-by-case basis using information provided in the relevant edition of Warren Publishing's TV & Cable Factbook. *Id.* at 20.⁷

⁴ Since the Stations' signals do not overlap, no multiple ownership issues exist. Thus, there has been no need for the FCC to authorize the relationship under Note 5 of Section 73.3555 of the Commission's rules. However, this does not change the fact that KTNC operates as a satellite of KFWU.

⁵ The 1999 Edition of Television and Cable Factbook does recognize the Stations' parent/satellite relationship, however, the Factbook incorrectly refers to KFWU as the satellite.

⁶ The reason for the omission is unknown. It is possible that Warren Publishing was not informed of the relationship at the time the 1998 edition was published.

⁷ Subsequent to the June 22, 1995 Order referenced above, for the reasons stated in such decision, the Commission created a separate regulatory fee category for satellite stations.

Magalie Salas, Esq.

May 26, 1999

Page 4

Under the case-by-case analysis, a reduction of fees would have been clearly warranted in this instance. In particular, the combined number of total households served by the Stations is only approximately 400,000. *See TV & Cable Factbook No. 66* (1998), A-112, A-171. An average station in the 51st ranked DMA serves more households than the KFWU and KTNC combination. *Id.* at A22-A25. Yet, Pappas paid a total of \$38,750 for the Stations (KFWU – \$37,575 and KTNC – \$1,175), while a VHF station in the 51st ranked market that serves *more* households was required to pay only \$22,575. Using this analysis, Pappas would have had to pay a total of no more than \$11,975 for both stations.⁸

In further support, KFWU serves only 29,120 households, yet Pappas paid \$37,575 in regulatory fees for KFWU alone. *See supra 1998 Factbook*, A-171. Based on the households served, KFWU should have to pay the amount for a Remaining Markets station – \$3,100.

In light of the amount Pappas has paid for KFWU, requiring payment of full market fees for both stations under these circumstances would be contrary to the Commission's underlying regulatory fee policy and a gross injustice to Pappas, the Stations' operations and the public interest. For such reasons, Pappas respectfully asserts good cause exists and the public interest would be served by a reduction of its FY1998 regulatory fees. In particular, Pappas respectfully requests KTNC's FY1998 regulatory fee be reduced by \$13,000 to \$1,175.

In the alternative, Pappas requests a reduction of KFWU's FY1998 regulatory fees and KFWU be assessed a fee of a Remaining Markets station – \$3,100.00 and requests a refund in the amount of \$21,475 (amount paid for KFWU (\$37,575) minus amount due for KFWU as Remaining Market Station (\$3,100) minus amount owed for KTNC as full market station (\$13,000)).⁹ Since Pappas filed its regulatory fees in good faith based on how the station's actually operated during the relevant period, a waiver of any late fees is also respectfully requested.

⁸ Based on 1998 Factbook a station that serves approximately 400,000 households would be located in the 67th Market. *See supra 1998 Factbook*, A-2. The FY1998 regulatory fee for a VHF station in the 67th Market would be assessed a regulatory fee of \$11,975. *See In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 1998*, MM Docket No. 98-36, released June 16, 1998.

⁹ Pappas' alternative request in no way changes its position that KTNC operates as a satellite of KFWU.

ANN BAVENDER*
ANNE GOODWIN CRUMP
VINCENT J. CURTIS, JR.
RICHARD J. ESTEVEZ
PAUL J. FELDMAN
RICHARD HILDRETH
FRANK R. JAZZO
ANDREW S. KERSTING
EUGENE M. LAWSON, JR.
SUSAN A. MARSHALL*
HARRY C. MARTIN
GEORGE PETRITSAS
RAYMOND J. QUIANZON
LEONARD R. RAISH
JAMES P. RILEY
KATHLEEN VICTORY
HOWARD M. WEISS

* NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETH, P.L.C.

ATTORNEYS AT LAW

11th FLOOR, 1300 NORTH 17th STREET

ARLINGTON, VIRGINIA 22209-3801

(703) 812-0400

TELECOPIER

(703) 812-0486

INTERNET

www.fhh-telcomlaw.com

FRANK U. FLETCHER
(1939-1985)
ROBERT L. HEALD
(1956-1983)
PAUL D.P. SPEARMAN
(1936-1962)
FRANK ROBERSON
(1936-1961)
RUSSELL ROWELL
(1948-1977)

EDWARD F. KENEHAN
(1960-1978)

CONSULTANT FOR INTERNATIONAL AND
INTERGOVERNMENTAL AFFAIRS
SHELDON J. KRYS
U.S. AMBASSADOR (1981)

OF COUNSEL
EDWARD A. CAINE*
MITCHELL LAZARUS*
EDWARD S. O'NEILL*
JOHN JOSEPH SMITH

WRITER'S DIRECT

May 26, 1999

(703) 812-0511

BY HAND DELIVERY

Magalie Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20544
Attention: Managing Director

RECEIVED
MAY 26 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Request for Deferral and Reduction of 1998 Regulatory Fees
for Television Stations KTNC(TV), Concord, California / KFWU(TV),
Fort Bragg, California

Dear Ms. Salas:

On behalf of Pappas Concord Partners¹ ("Pappas"), licensee of KTNC(TV), Concord, California and KFWU(TV), Fort Bragg, California, this letter respectfully requests reduction of its 1998 regulatory fees for stations KTNC and/or KFWU. As demonstrated in detail below, good cause exists and the public interest would be served by this reduction. For reasons also stated below, Pappas respectfully requests deferral of any payment obligation pending consideration of its reduction showing.

Background

This request is being filed as a result of a letter from the FCC's Office of Managing Director dated March 3, 1999,² concerning FY 1998 regulatory fees for KTNC, Concord,

¹ Pappas Telecasting of Concord, A California Limited Partnership, was the prior licensee of both KTNC and KFWU. The licenses were subsequently transferred on a *pro forma* basis to Pappas Concord Partners, pursuant to FCC authorization.

² A copy of the letter is attached for ease of reference.

Magalie Salas, Esq.
May 26, 1999
Page 2

California. The FCC's letter asserts that an erroneous regulatory fee was paid for KTNC, and requests the payment of an additional \$13,000, plus a \$3,250 insufficient fee penalty, for its FY1998 regulatory fees or, in the alternative, the submission of a statement establishing that Pappas is not obligated to pay the additional amount.

On April 14, 1999, Pappas filed a statement detailing why it was not obligated to pay the additional amount. Further, Pappas demonstrated that the payment of such additional amount would be contrary to the public interest and the Commission's rules and regulations concerning the assessment and collection of regulatory fees. Subsequent to Pappas' response, Pappas was informed in a teleconference with Claudette Pride, Chief of the FCC's Fee Section, that a formal request for reduction and deferral with the Managing Director would be necessary. Accordingly, pursuant to Section 1.1166 of the FCC's rules, Pappas hereby respectfully submits the following request.³

Request for Reduction/Deferral

Section 1.1166 states that regulatory fees may be reduced in specific instances, on a case by case basis, where good cause is shown and where a reduction would promote the public interest. *See* 47 CFR §1.1166. As stated above, Pappas is the licensee of both UHF TV station KTNC, Concord, California, and VHF TV station KFWU, Fort Bragg, California (collectively referred to as the "Stations"). Both KTNC and KFWU are listed in the 5th ranked San Francisco-Oakland-San Jose Designated Market Area (DMA) by TV & Cable Factbook No. 66 (1998). Since April 1997, the Stations have had a parent/satellite relationship whereby the stations air the same programming. KTNC rebroadcasts, as a satellite, the programming broadcast by KFWU. KTNC makes no local origination.

While the stations are in the same DMA, such a parent/satellite arrangement is in the public interest since each station serves a different part of the San Francisco DMA. In particular, KFWU is located in the northern portion of the DMA and serves approximately 29,120 television households, whereas KTNC is located toward the center of the DMA and serves approximately 368,530 television households. *See* TV & Cable Factbook No. 66 (1998), A-112, A-171. The parent/satellite relationship allows the Stations to maximize programming to the DMA allowing for the provision of quality programming to both station's service areas. The Commission has long recognized the public interest benefits of the parent/satellite relationship. *See Television Satellite Stations Review of Policy and Rules (Television Satellite Stations)*, 6 FCC Rcd 4212.

³ If Pappas would have known that questions would arise concerning the parent/satellite relationship, Pappas would have filed this request with its regulatory fee payment at the time such payments were due.

Magalie Salas, Esq.
May 26, 1999
Page 3

As stated above, the Stations operated as parent/satellite during the FY1998 regulatory fee period.⁴ Since KFWU sends the Stations' programming to KTNC for broadcast, KFWU is the parent and KTNC is the satellite.⁵ Pappas filed its regulatory fees accordingly, remitting \$1,175 in payment of KTNC's regulatory fees (Satellite TV Station Fee) and \$37,575 for KFWU (Commercial VHF Station in Markets 1-10). *See In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 1998*, MM Docket No. 98-36, released June 16, 1998.

Pappas is now cognizant that the KFWU/KTNC parent/satellite relationship is not listed in the 1998 Edition of Warren Publishing's Television & Cable Factbook ("1998 Factbook").⁶ Yet, despite not being listed in the 1998 Factbook, the Stations in fact operated as parent/satellite and thus, a reduction of fees is warranted. As demonstrated below, such a reduction in this instance is consistent with the Commission's underlying policies of the assessment and collection of regulatory fees.

In the Commission's *Memorandum Opinion and Order* concerning the assessment and collection of regulatory fees for the fiscal year 1994, the Commission analyzed parent/satellite relationships and the assessment of regulatory fees for such combinations. The Commission recognized the public interest factors involved with such relationships and the possible inequities of assessing full service fees to both stations. *See Assessment and Collection of Regulatory Fees for the 1994 Fiscal Year*, MD Docket No. 94-19, at paras. 18-22 (June 22, 1995). The Commission stated that it would analyze parent/satellite relationships based on the total of households served and assess regulatory fees on a case-by-case basis using information provided in the relevant edition of Warren Publishing's TV & Cable Factbook. *Id.* at 20.⁷

⁴ Since the Stations' signals do not overlap, no multiple ownership issues exist. Thus, there has been no need for the FCC to authorize the relationship under Note 5 of Section 73.3555 of the Commission's rules. However, this does not change the fact that KTNC operates as a satellite of KFWU.

⁵ The 1999 Edition of Television and Cable Factbook does recognize the Stations' parent/satellite relationship, however, the Factbook incorrectly refers to KFWU as the satellite.

⁶ The reason for the omission is unknown. It is possible that Warren Publishing was not informed of the relationship at the time the 1998 edition was published.

⁷ Subsequent to the June 22, 1995 Order referenced above, for the reasons stated in such decision, the Commission created a separate regulatory fee category for satellite stations.

Magalie Salas, Esq.

May 26, 1999

Page 4

Under the case-by-case analysis, a reduction of fees would have been clearly warranted in this instance. In particular, the combined number of total households served by the Stations is only approximately 400,000. *See TV & Cable Factbook No. 66* (1998), A-112, A-171. An average station in the 51st ranked DMA serves more households than the KFWU and KTNC combination. *Id.* at A22-A25. Yet, Pappas paid a total of \$38,750 for the Stations (KFWU -- \$37,575 and KTNC -- \$1,175), while a VHF station in the 51st ranked market that serves *more* households was required to pay only \$22,575. Using this analysis, Pappas would have had to pay a total of no more than \$11,975 for both stations.⁸

In further support, KFWU serves only 29,120 households, yet Pappas paid \$37,575 in regulatory fees for KFWU alone. *See supra 1998 Factbook*, A-171. Based on the households served, KFWU should have to pay the amount for a Remaining Markets station -- \$3,100.

In light of the amount Pappas has paid for KFWU, requiring payment of full market fees for both stations under these circumstances would be contrary to the Commission's underlying regulatory fee policy and a gross injustice to Pappas, the Stations' operations and the public interest. For such reasons, Pappas respectfully asserts good cause exists and the public interest would be served by a reduction of its FY1998 regulatory fees. In particular, Pappas respectfully requests KTNC's FY1998 regulatory fee be reduced by \$13,000 to \$1,175.

In the alternative, Pappas requests a reduction of KFWU's FY1998 regulatory fees and KFWU be assessed a fee of a Remaining Markets station -- \$3,100.00 and requests a refund in the amount of \$21,475 (amount paid for KFWU (\$37,575) minus amount due for KFWU as Remaining Market Station (\$3,100) minus amount owed for KTNC as full market station (\$13,000)).⁹ Since Pappas filed its regulatory fees in good faith based on how the station's actually operated during the relevant period, a waiver of any late fees is also respectfully requested.

⁸ Based on 1998 Factbook a station that serves approximately 400,000 households would be located in the 67th Market. *See supra 1998 Factbook*, A-2. The FY1998 regulatory fee for a VHF station in the 67th Market would be assessed a regulatory fee of \$11,975. *See In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 1998*, MM Docket No. 98-36, released June 16, 1998.

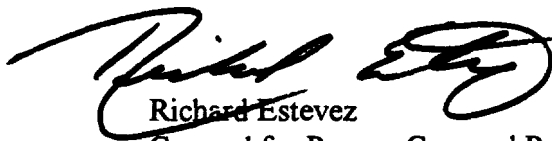
⁹ Pappas' alternative request in no way changes its position that KTNC operates as a satellite of KFWU.

FLETCHER, HEALD & HILDRETH, P.L.C.

Magalie Salas, Esq.
May 26, 1999
Page 5

Should there be any questions regarding this matter or if additional documentation is necessary, kindly communicate directly with the undersigned.

Yours very truly,
FLETCHER, HEALD & HILDRETH, P.L.C.

A handwritten signature in black ink, appearing to read "Richard Estevez", written over a horizontal line.

Richard Estevez
Counsel for Pappas Concord Partners

Attachment

cc: Ms. Regina Dorsey, Chief of Billing and Collections Branch (*By Hand Delivery*) (w/enc.)
Ms. Claudette Pride, Chief of Fee Section (*By Hand Delivery*) (w/enc.)

FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

MAR 08 1999

OFFICE OF
MANAGING DIRECTOR

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

PAPPAS TELECASTING OF CONCORD
KTNC-TV
500 SOUTH CHINOWTH ROAD
VISALIA, CA 93277

Dear Licensee:

This letter is in reference to the incorrect amount paid for your 1998 annual regulatory fee(s) which were due to the Federal Communications Commission (FCC) on September 18, 1998.

The FCC is currently verifying its FY '98 regulatory fee collections to identify those licensee who may have paid an incorrect amount. That process includes, but is not limited to, database verification; hard copy documentation research; review of fee-exempt certifications; and review of waivers requested and fee decisions issued; and classification as defined by the Nielsen Rating in the Broadcasting TV & Cable Factbook for 1998.

After a close examination of our records, we have determined that an incorrect payment of \$1,175 was received for the following station. The correct fee for this station should be \$14,175, a difference of \$13,000.

KTNC-TV

VISALIA, CA

In accordance with Section 9 [47 U.S.C. 159(c)(1)], a 25 percent insufficient fee penalty is assessed for the difference. Please complete the enclosed partially filled-in FCC Form 159 (Remittance Advice), and remit it together with your payment in full of the insufficient fee of \$13,000 and the associated 25 percent penalty of \$3,250 which totals \$16,250. The completed FCC Form 159 and your remittance must be mailed to the Federal Communications Commission, P.O. Box 358835, Pittsburgh, PA 15251-5835, within twenty days of the date of this letter.

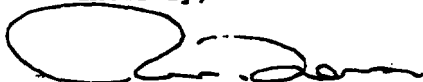
You should also review your records to ensure that correct payments have been made for any auxiliary stations associated with this call sign, or for any other call signs assigned to you or for any prior fiscal years for which payments may be due, and remit payment plus 25 percent penalty for each year on a separate FCC Form 159.

If you believe you are not obligated to pay the additional fee under the Commission's Rules, or feel that the amount you submitted is the correct amount, please submit complete documentation supporting your position within twenty days of the date of this letter. These documents should be sent to:

Federal Communications Commission
ATTN: Billings & Collections Branch
445 12th Street, SW
Washington, DC 20554

If you have further questions, you may contact my staff at (202) 418-1995.

Sincerely,



Regina W. Dorsey, Chief
Billings & Collections Branch

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING		FEDERAL COMMUNICATIONS COMMISSION REMITTANCE ADVI		APPROVED BY O 3060-058
(1) LOCKBOX # 358835		PAGE NO. _____ OF _____		SPECIAL USE FCC USE ONLY
SECTION A - PAYER INFORMATION				
(3) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)			(5) TOTAL AMOUNT PAID (dollars and cents) 16,250.00	
(4) STREET ADDRESS LINE NO. 1				
(5) STREET ADDRESS LINE NO. 2				
(6) CITY		(7) STATE		(8) ZIP CODE
(9) DAYTIME TELEPHONE NUMBER (include area code)		(10) COUNTRY CODE (if not in U.S.A.)		
IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)				
SECTION B - APPLICANT INFORMATION				
(11) APPLICANT NAME (if paying by credit card, enter name exactly as it appears on your card)				
(12) STREET ADDRESS LINE NO. 1				
(13) STREET ADDRESS LINE NO. 2				
(14) CITY		(15) STATE		(16) ZIP CODE
(17) DAYTIME TELEPHONE NUMBER (include area code)		(18) COUNTRY CODE (if not in U.S.A.)		
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEETS (FORM 1				
SECTION C - PAYMENT INFORMATION				
(19A) FCC CALL SIGN/OTHER ID KTNC-TV		(20A) PAYMENT TYPE CODE (PTC) M D U 8		(21A) QUANTITY 13,000.00
(19B) FCC CODE 1		(20B) PAYMENT TYPE CODE (PTC) F I N E		(21B) QUANTITY 3,250.00
(19C) FCC CODE 1		(20C) PAYMENT TYPE CODE (PTC)		(21C) QUANTITY
(19D) FCC CODE 1		(20D) PAYMENT TYPE CODE (PTC)		(21D) QUANTITY
(19E) FCC CODE 1		(20E) PAYMENT TYPE CODE (PTC)		(21E) QUANTITY
(19F) FCC CODE 1		(20F) PAYMENT TYPE CODE (PTC)		(21F) QUANTITY
SECTION D - TAXPAYER INFORMATION (REQUIRED)				
(22) PAYER TIN		(23) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-1 IS DIFFERENT FROM PAYER NAME APPLICANT TIN 0		
SECTION E - CERTIFICATION				
I, _____, Certify under penalty of perjury that the foregoing and supporting information are true and correct to the best of my knowledge, information and SIGNATURE _____				
SECTION F - CREDIT CARD PAYMENT INFORMATION				
(24) MASTERCARD/VISA ACCOUNT NUMBER		EXPIRATION DATE:		
(25) I hereby authorize the FCC to charge my VISA or MASTERCARD for the service(s)/authorization(s) herein described.		AUTHORIZED SIGNATURE		
(26) SEE PUBLIC BURDEN ESTIMATE ON REVERSE		FCC FORM 159 JULY 1997 (REV)		

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING		FEDERAL COMMUNICATIONS COMMISSION REMITTANCE ADVICE		APPROVED BY OMB 3080-0589	
1) LOCKBOX #		PAGE NO <u>1</u> OF <u>3</u>		SPECIAL USE	
SECTION A - PAYER INFORMATION					
2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) PAPPAS TELECASTING OF CONCORD, a California Limited Partnership				15) TOTAL AMOUNT PAID (dollars and cents) \$39,081.00	
4) STREET ADDRESS LINE NO. 1 500 South Chinowth Road					
5) STREET ADDRESS LINE NO. 2					
3) CITY Visalia		17) STATE CA		18) ZIP CODE 93277	
6) DAYTIME TELEPHONE NUMBER (include area code) (209) 733-7800		19) COUNTRY CODE (if not in U.S.A.)			
SECTION B - APPLICANT INFORMATION					
11) APPLICANT NAME (if paying by credit card, enter name exactly as it appears on your card) Pappas Concord Partners					
12) STREET ADDRESS LINE NO. 1 500 South Chinowth Road					
13) STREET ADDRESS LINE NO. 2					
14) CITY Visalia		16) STATE CA		18) ZIP CODE 93277	
17) DAYTIME TELEPHONE NUMBER (include area code) (209) 733-7800		19) COUNTRY CODE (if not in U.S.A.)			
SECTION C - PAYMENT INFORMATION					
20) FCC CALL SIGN/OTHER ID KFWU-TV		22A) PAYMENT TYPE CODE (PTC) M A V 8		21A) QUANTITY 1	
23A) FCC CODE 1 8		24A) FCC CODE 2 CA, Fort Bragg			
10B) FCC CALL SIGN/OTHER ID K23CZ		22B) PAYMENT TYPE CODE (PTC) M L P 8		21B) QUANTITY 1	
23B) FCC CODE 1		24B) FCC CODE 2			
10C) FCC CALL SIGN/OTHER ID WLE351		22C) PAYMENT TYPE CODE (PTC) M U B 8		21C) QUANTITY 1	
23C) FCC CODE 1		24C) FCC CODE 2			
10D) FCC CALL SIGN/OTHER ID WLE335		22D) PAYMENT TYPE CODE (PTC) M U B 8		21D) QUANTITY 1	
23D) FCC CODE 1		24D) FCC CODE 2			
SECTION D - TAXPAYER INFORMATION (REQUIRED)					
25) PAYER TIN 0 6 8 0 3 5 2 4 5 9				26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2 APPLICANT TIN 0 9 1 1 8 6 3 7 9 9	
SECTION E - CERTIFICATION					
27) CERTIFICATION STATEMENT I, LeBon G. Abercrombie , Certify under penalty of perjury that the foregoing and supporting information are true and correct to the best of my knowledge, information and belief. SIGNATURE <i>LeBon G. Abercrombie</i>					
SECTION F - CREDIT CARD PAYMENT INFORMATION					
28) MASTERCARD/VISA ACCOUNT NUMBER					
MASTERCARD		MONTH YEAR			
VISA		AUTHORIZED SIGNATURE			
I hereby authorize the FCC to charge my VISA or MASTERCARD for the service(s)/product(s) listed above.		DATE			

FEDERAL COMMUNICATIONS COMMISSION

APPROVED BY OMB 3060-0589

EMITTANCE ADVICE (Continuation Sheet)

PAGE NO. 2 OF 3

USE THIS SECTION ONLY FOR EACH ADDITIONAL APPLICANT INFORMATION

SECTION BB - ADDITIONAL APPLICANT INFORMATION

(1) APPLICANT NAME (If paying by credit card, enter name exactly as it appears on your card.)

(2) STREET ADDRESS LINE NO. 1

(3) STREET ADDRESS LINE NO. 2

(14) CITY

(15) STATE

(16) ZIP CODE

(17) DAYTIME TELEPHONE NUMBER (include area code)

(18) COUNTRY CODE (if not in U.S.A.)

IF MORE THAN ONE FEE IS DUE, ENTER IN BLOCKS CC-1 THROUGH CC-4

SECTION CC - PAYMENT INFORMATION

(19A) FCC CALL SIGN/OTHER ID

(20A) PAYMENT TYPE CODE (PTC)

(21A) QUANTITY

(22A) FEE DUE FOR (PTC) IN BLOCK 20A

KTNC-TV

M S S 8

1

\$ 1,175.00

(23A) FCC CODE 1

(24A) FCC CODE 2

CA, Concord

(19B) FCC CALL SIGN/OTHER ID

(20B) PAYMENT TYPE CODE (PTC)

(21B) QUANTITY

(22B) FEE DUE FOR (PTC) IN BLOCK 20B

WHG447

M U B 8

1

\$ 11.00

(23B) FCC CODE 1

(24B) FCC CODE 2

(19C) FCC CALL SIGN/OTHER ID

(20C) PAYMENT TYPE CODE (PTC)

(21C) QUANTITY

(22C) FEE DUE FOR (PTC) IN BLOCK 20C

WHG446

M U B 8

1

\$ 11.00

(23C) FCC CODE 1

(24C) FCC CODE 2

(19D) FCC CALL SIGN/OTHER ID

(20D) PAYMENT TYPE CODE (PTC)

(21D) QUANTITY

(22D) FEE DUE FOR (PTC) IN BLOCK 20D

WMU401

M U B 8

1

\$ 11.00

(23D) FCC CODE 1

(24D) FCC CODE 2

SECTION DD - TAXPAYER INFORMATION

(25) COMPLETE THIS BLOCK ONLY IF SECTION BB IS APPLICABLE

APPLICANT TIN

0

FEDERAL COMMUNICATIONS COMMISSION

APPROVED BY OMB 3060-0589

EMITTANCE ADVICE (Continuation Sheet)

PAGE NO. 3 OF 3~~PLEASE USE THIS SECTION ONLY FOR EACH ADDITIONAL APPLICANT~~

SECTION BB - ADDITIONAL APPLICANT INFORMATION

(11) APPLICANT NAME (If paying by credit card, enter name exactly as it appears on your card)

(12) STREET ADDRESS LINE NO. 1

(13) STREET ADDRESS LINE NO. 2

(14) CITY

(16) STATE

(15) ZIP CODE

(17) DAYTIME TELEPHONE NUMBER (include area code)

(18) COUNTRY CODE (if not in U.S.A.)

~~IF MORE BOXES ARE NEEDED, USE ADDITIONAL FCC 159-C CONTINUATION SHEETS~~

SECTION CC - PAYMENT INFORMATION

(19A) FCC CALL SIGN/OTHER ID

(20A) PAYMENT TYPE CODE (PTC)

(21A) QUANTITY

(22A) FEE DUE FOR (PTC) IN BLOCK 20A

WNTU838

M

U

B

8

1

\$11.00

(23A) FCC CODE 1

(24A) FCC CODE 2

(19B) FCC CALL SIGN/OTHER ID

(20B) PAYMENT TYPE CODE (PTC)

(21B) QUANTITY

(22B) FEE DUE FOR (PTC) IN BLOCK 20B

(23B) FCC CODE 1

(24B) FCC CODE 2

(19C) FCC CALL SIGN/OTHER ID

(20C) PAYMENT TYPE CODE (PTC)

(21C) QUANTITY

(22C) FEE DUE FOR (PTC) IN BLOCK 20C

(23C) FCC CODE 1

(24C) FCC CODE 2

(19D) FCC CALL SIGN/OTHER ID

(20D) PAYMENT TYPE CODE (PTC)

(21D) QUANTITY

(22D) FEE DUE FOR (PTC) IN BLOCK 20D

(23D) FCC CODE 1

(24D) FCC CODE 2

SECTION DD - TAXPAYER INFORMATION

(25) COMPLETE THIS BLOCK ONLY IF SECTION BB IS APPLICABLE

APPLICANT TIN

0

Payment Transactions Detail Report

Date: 07/19/1999

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Fcc Account Number	Payer TIN	Received Date							
9809158835519002	PAPPAS TELECASTING OF CONCORD 500 SOUTH CHINOWTH ROAD VISALIA CA 93277	FCC2017412		9/11/1998 00:00:0							
Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$39,081.00	\$39,081.00	2	MLP8	1	K23CZ	PAPPAS CONCORD PARTNERS	93277		\$265.00	1	PMT
\$39,081.00	\$39,081.00	1	MAV8	1	KFWUTV	PAPPAS CONCORD PARTNERS	93277		\$37,575.00	1	PMT
\$39,081.00	\$39,081.00	5	MSS8	1	KTNCTV	PAPPAS CONCORD PARTNERS	93277		\$1,175.00	1	PMT
\$39,081.00	\$39,081.00	7	MUB8	1	WHG446	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
\$39,081.00	\$39,081.00	6	MUB8	1	WHG447	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
\$39,081.00	\$39,081.00	4	MUB8	1	WLE335	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
\$39,081.00	\$39,081.00	3	MUB8	1	WLE351	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
\$39,081.00	\$39,081.00	8	MUB8	1	WMU401	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
\$39,081.00	\$39,081.00	9	MUB8	1	WNTU838	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
Total	9								\$39,081.00		

FEDERAL COMMUNICATIONS COMMISSION

APPROVED BY OMB 3060-0589

EMITTANCE ADVICE (Continuation Sheet)

PAGE NO. 3 OF 3

USE THIS SECTION ONLY FOR EACH ADDITIONAL APPLICANT

SECTION BB - ADDITIONAL APPLICANT INFORMATION

(11) APPLICANT NAME (if paying by credit card, enter name exactly as it appears on your card)

(12) STREET ADDRESS LINE NO. 1

(12) STREET ADDRESS LINE NO. 2

(14) CITY

(16) STATE

(16) ZIP CODE

(17) DAYTIME TELEPHONE NUMBER (include area code)

(18) COUNTRY CODE (if not in U.S.A.)

IF MORE BOXES ARE NEEDED, USE ADDITIONAL FCC FORM 159-C IN BLOCK INFORMATION SHEET

SECTION CC - PAYMENT INFORMATION

(18A) FCC CALL SIGN/OTHER ID

(20A) PAYMENT TYPE CODE (PTC)

(21A) QUANTITY

(22A) FEE DUE FOR (PTC) IN BLOCK 20A

WNTU838

M

U

B

8

1

11.00

(23A) FCC CODE 1

(24A) FCC CODE 2

(18B) FCC CALL SIGN/OTHER ID

(20B) PAYMENT TYPE CODE (PTC)

(21B) QUANTITY

(22B) FEE DUE FOR (PTC) IN BLOCK 20B

(23B) FCC CODE 1

(24B) FCC CODE 2

(18C) FCC CALL SIGN/OTHER ID

(20C) PAYMENT TYPE CODE (PTC)

(21C) QUANTITY

(22C) FEE DUE FOR (PTC) IN BLOCK 20C

(23C) FCC CODE 1

(24C) FCC CODE 2

(18D) FCC CALL SIGN/OTHER ID

(20D) PAYMENT TYPE CODE (PTC)

(21D) QUANTITY

(22D) FEE DUE FOR (PTC) IN BLOCK 20D

(23D) FCC CODE 1

(24D) FCC CODE 2

SECTION DD - TAXPAYER INFORMATION

(25) COMPLETE THIS BLOCK ONLY IF SECTION BB IS APPLICABLE

APPLICANT TIN

0

Payment Transactions Detail Report

Date: 11/09/1999

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Fcc Account Number	Payer TIN	Received Date										
9809158835519002	PAPPAS TELECASTING OF CONCORD 500 SOUTH CHINOWTH ROAD VISALIA CA 93277	FCC2017412		9/11/1998 00:00:0										
Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type			
\$39,081.00	\$39,081.00	2	MLP8	1	K23CZ	PAPPAS CONCORD PARTNERS	93277		\$265.00	1	PMT			
\$39,081.00	\$39,081.00	1	MAV8	1	KFWUTV	PAPPAS CONCORD PARTNERS	93277		\$37,575.00	1	PMT			
\$39,081.00	\$39,081.00	5	MSS8	1	KTNCTV	PAPPAS CONCORD PARTNERS	93277		\$1,175.00	1	PMT			
\$39,081.00	\$39,081.00	7	MUB8	1	WHG446	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT			
\$39,081.00	\$39,081.00	6	MUB8	1	WHG447	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT			
\$39,081.00	\$39,081.00	4	MUB8	1	WLE335	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT			
\$39,081.00	\$39,081.00	3	MUB8	1	WLE351	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT			
\$39,081.00	\$39,081.00	8	MUB8	1	WMU401	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT			
\$39,081.00	\$39,081.00	9	MUB8	1	WNTU838	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT			
Total	9									\$39,081.00				